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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**JUL 30 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

)  
Replacement of Part 90 by Part 88 to )  
Revise the Private Land Mobile Radio )  
Services and Modify the Policies )  
Governing Them. )

PR Docket No. 92-235

REPLY OF AERONAUTICAL RADIO, INC.

Aeronautical Radio, Inc. (ARINC) hereby replies to Comments submitted in response to the Commission's Notice of Proposed Rulemaking (NPRM) released herein November 6, 1992 (57 Fed. Reg. 54034).

In its opening Comments in this rulemaking, ARINC supported the basic thrust of the Commission's proposals. ARINC and the air transport industry are dependent upon intensive land mobile communications in and around airports and have developed efficient, low powered systems to accommodate these needs. As air transportation grows and as the airlines become even more sophisticated and efficient in their ground operations, more communications will be needed, and therefore the air transport industry supports the Commission's desire to increase the efficiency of use of existing private land mobile spectrum as well as the expansion of the amount of spectrum available.

ARINC and the air transport industry generally support the Comments submitted by NABER, especially in regard to the need for:

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1. specific coordinators to be responsible for specific band segments;
2. creation of new assignable radio channels through improvement in spectrum efficiency;
3. protection of low power systems from an influx of higher powered systems; and
4. provision of sufficient time to amortize the cost of transition to more spectrally efficient technologies.

ARINC also supports NABER's call to address the issue of any ultimate choice for a standard channel increment under a separate proceeding. However, the Commission should not leave narrower channel spacing strictly up to consumer choice. The FCC should set the standards in this or a follow-on proceeding and require the most spectrally efficient technology that is reasonably practicable.

In determining the practicability of a channel plan, the Commission can make reasonable projections of future technology; it need not be restricted to proven off-the-shelf systems in existence today. By setting a reasonable transition period, the manufacturers will be able to produce the equipment necessary, and the consumers will be able to amortize their current equipment and make a reasonable transition to the new equipment. An extended, but firm, transition plan will aid all involved in meeting the Commission's goals of making additional communications capacity available to private land mobile systems.

With these minor adjustments and those set forth in ARINC's initial Comments, the Commission should adopt its proposals in this proceeding, leaving only the ultimate narrow band goals to a follow-on rulemaking.

Respectfully submitted,  
AERONAUTICAL RADIO, INC.

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